

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Objection Deadline: Nov. 13, 2023, at 4:00 p.m. (ET)**

**NOTICE OF SECOND MONTHLY APPLICATION OF KPMG LLP PROVIDING  
AUDIT SERVICES TO THE DEBTORS REQUESTING ALLOWANCE  
OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR  
THE PERIOD SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

**PLEASE TAKE NOTICE** that KPMG LLP (the “**Applicant**”) has today filed the attached *Second Monthly Application of KPMG LLP Providing Audit Services to the Debtors Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period September 1, 2023 Through September 30, 2023* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 (the “**Bankruptcy Court**”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application must be made in accordance with the *Order Establishing Procedures For Interim Compensation And Reimbursement of Expenses For Chapter 11 Professionals and Committee Members, entered July 25, 2023* [D.I. 181] (the “**Interim Compensation Order**”) and must be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, DE 19801, and be served

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

upon and received by (a) counsel to the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), (i) White & Case LLP, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn: Thomas E Lauria ([tlauria@whitecase.com](mailto:tlauria@whitecase.com)), Matthew C. Brown ([mbrown@whitecase.com](mailto:mbrown@whitecase.com)), and Fan B. He ([fhe@whitecase.com](mailto:fhe@whitecase.com))); (ii) White & Case LLP, 1221 Avenue of the Americas New York, NY 10020 (Attn: David M. Turetsky ([david.turetsky@whitecase.com](mailto:david.turetsky@whitecase.com))); (iii) White & Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606 (Attn: Jason N. Zakia ([jzakia@whitecase.com](mailto:jzakia@whitecase.com))); and (iv) White & Case LLP, 555 South Flower Street, Suite 2700, Los Angeles, CA 90071 (Attn: Roberto Kampfner ([rkampfner@whitecase.com](mailto:rkampfner@whitecase.com)), Doah Kim ([doah.kim@whitecase.com](mailto:doah.kim@whitecase.com)), and RJ Szuba ([rj.szuba@whitecase.com](mailto:rj.szuba@whitecase.com))); (b) proposed counsel to the Debtors, Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200 Wilmington, DE 19801 (Attn: Donald J. Detweiler ([don.detweiler@wbd-us.com](mailto:don.detweiler@wbd-us.com)), and Morgan L. Patterson ([morgan.patterson@wbd-us.com](mailto:morgan.patterson@wbd-us.com))); (c) counsel to the Official Committee of Unsecured Creditors, (i) Troutman Pepper Hamilton Sanders LLP, Hercules Plaza, Suite 5100, 1313 N. Market Street, Wilmington, DE 19801 (Attn: David M. Fournier ([david.fournier@troutman.com](mailto:david.fournier@troutman.com)), Marcy J. McLaughlin Smith ([marcy.smith@troutman.com](mailto:marcy.smith@troutman.com)), and Tori L. Remington ([tori.remington@troutman.com](mailto:tori.remington@troutman.com))); (ii) Troutman Pepper Hamilton Sanders LLP, 3000 Two Logan Square, 18th & Arch Streets, Philadelphia, PA 19103-2799 (Attn: Francis J. Lawall ([francis.lawall@troutman.com](mailto:francis.lawall@troutman.com))); (iii) Troutman Pepper Hamilton Sanders LLP, 875 Third Avenue, New York, NY 10022 (Attn: Deborah Kovsky-Apap ([deborah.kovsky@troutman.com](mailto:deborah.kovsky@troutman.com))); and (iv) Troutman Pepper Hamilton Sanders LLP, 4000 Town Center, Suite 1800, Southfield, MI 48075 (Attn: Sean P. McNally ([sean.mcnally@troutman.com](mailto:sean.mcnally@troutman.com))); (d) the Office of The United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801 (Attn: Benjamin A. Hackman

([Benjamin.A.Hackman@usdoj.gov](mailto:Benjamin.A.Hackman@usdoj.gov))); and (e) counsel to the Official Committee of Equity Security Holders, (i) Brown Rudnick LLP, 7 Times Square, New York, NY 10036 (Attn: Robert J. Stark ([rstark@brownrudnick.com](mailto:rstark@brownrudnick.com)) and Bennett S. Silverberg ([bsilverberg@brownrudnick.com](mailto:bsilverberg@brownrudnick.com))); (ii) Brown Rudnick LLP, One Financial Center, Boston, MA 02111 (Attn: Matthew A. Sawyer ([msawyer@brownrudnick.com](mailto:msawyer@brownrudnick.com))); and (iii) Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801 (Attn: Eric J. Monzo ([emonzo@morrisjames.com](mailto:emonzo@morrisjames.com)) and Brya M. Keilson ([bkeilson@morrisjames.com](mailto:bkeilson@morrisjames.com))) by no later than **4:00 p.m. (Eastern Time) on November 13, 2023** (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that if any responses or objections to the Application are timely filed, served and received in accordance with this notice, a hearing on the Application will be held at the convenience of the Bankruptcy Court. Only those objections made in writing and timely filed and received in accordance with the Administrative Order and the procedures described herein will be considered by the Bankruptcy Court at such hearing.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Administrative Order, if no objection to the Application is timely filed, served and received by the Objection Deadline, the Applicant may be paid an amount equal to the lesser of (i) 80 percent of the fees and 100 percent of expenses requested in the Application or (ii) 80 percent of the fees and 100 percent of the expenses not subject to an objection without the need for further order of the Bankruptcy Court.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 23, 2023  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u></p> <p><b>WOMBLE BOND DICKINSON (US) LLP</b> Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 <a href="mailto:don.detweiler@wbd-us.com">don.detweiler@wbd-us.com</a> <a href="mailto:morgan.patterson@wbd-us.com">morgan.patterson@wbd-us.com</a></p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b> Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 <a href="mailto:tlauria@whitecase.com">tlauria@whitecase.com</a> <a href="mailto:mbrown@whitecase.com">mbrown@whitecase.com</a> <a href="mailto:fhe@whitecase.com">fhe@whitecase.com</a></p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 <a href="mailto:david.turetsky@whitecase.com">david.turetsky@whitecase.com</a></p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 <a href="mailto:jzakia@whitecase.com">jzakia@whitecase.com</a></p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 <a href="mailto:rkampfner@whitecase.com">rkampfner@whitecase.com</a> <a href="mailto:doah.kim@whitecase.com">doah.kim@whitecase.com</a> <a href="mailto:rj.szuba@whitecase.com">rj.szuba@whitecase.com</a></p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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